

**THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

<b>FLOORCOVERINGS INTERNATIONAL, LTD.</b>	:	
	:	
<b>Plaintiff</b>	:	<b>1-CV-00-0182</b>
	:	
<b>v.</b>	:	
	:	
<b>WILLIAM LEE FREEMAN</b>	:	<b>SYLVIA H. RAMBO</b>
	:	<b>CHIEF JUDGE</b>
<b>Defendant</b>	:	

**CERTIFICATE OF SERVICE**

I, Peter Russo, hereby certify that I am on this day serving a copy of the foregoing document upon the person (s) and in the manner indicated below:

Service by First-Class Mail, Postage Prepaid, and Addressed as follows:

F. Stephenson Matthes, Esquire  
Dennis R. Sheaffer, Esquire  
Tucker, Arensberg & Swartz  
117 North Front Street  
Harrisburg, PA 17108

Michael R. Gray, Esquire  
Gray Plant Mooty  
500 IDS Center  
80 South Eighth Street  
Minneapolis, Minnesota 55402

/s/ Peter J. Russo  
Peter J. Russo

Date: Friday, December 29, 2006

Court.

- 6) On August 16, 2005, Defendant completed the Chapter 13 Plan that was confirmed on October 9, 2002.
- 7) On August 18, 2005, United States Bankruptcy Judge, Mary D. France issued an Order granting the Defendant a discharge pursuant to Section 1328(a) of Title 11, United States Code.
- 8) Having fully complied with the terms of the Chapter 13 Plan and subsequently having been discharged, Defendant requests the dismissal of the above-captioned matter.

Respectfully submitted,

**LAW OFFICES OF PETER J. RUSSO, P.C.**

/s/Peter J. Russo, Esq.

**Peter J. Russo, Esquire**

PA Attorney ID No. 72897

**Scott A. Stein, Esquire**

PA Attorney ID No. 81738

**John N. Papoutsis, Esquire**

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3800 Market Street

Camp Hill, PA 17011

**Date:** Friday, December 29, 2006

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<b>Plaintiff</b>	:	<b>1-CV-00-0182</b>
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	:	<b>CHIEF JUDGE</b>
<b>Defendant</b>	:	

**MOTION OF DEFENDANT WILLIAM LEE FREEMAN TO DISMISS CLAIMS OF  
FLOORCOVERINGS INTERNATIONAL, LTD**

Defendant, William Lee Freeman, by and through his undersigned counsel, hereby moves to dismiss, with prejudice, the claims asserted in the above-captioned civil action by Plaintiff, Floorcoverings International, LTD., against Defendant, William Lee Freeman and in support thereof avers the following:

- 1) On January 31, 2000, Plaintiff filed the above captioned matter against William Lee Freeman.
- 2) On August 2, 2001, Defendant filed a bankruptcy petition, docketed at 1:01-bk-04273-MDF, in the United States Bankruptcy Court for the Middle District of Pennsylvania seeking the protection afforded by Chapter 13 of Title 11, United States Code.
- 3) The filing of Defendant's petition stayed all proceedings in the above-captioned matter.
- 4) Plaintiff was listed a creditor in Defendant's bankruptcy petition.
- 5) On October 9, 2002, the Chapter 13 Plan was confirmed by the Bankruptcy